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Chigbo P. UMEH
Reg. No. 18516-050
FCI Allenwood Low
Federal Correctional Institution
P. O. Box 1000
White Deer, Pa. 17887-1000

Hon. Jed S. RAKOFF
UNITED STATES DISTRICT COURT
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

June 26, 2023

Regarding: United States v. Umeh, Criminal case no. 1:09-cr-00527 (JSR)
REQUEST FOR APPOINTMENT OF COUNSEL

Dear Judge Rakoff:

Defendant Pro Se Chigbo P. Umeh ("Umeh") respectfully submits this letter to request for appointment of Attorney Alexey TARASOV to represent him in light of this Court's response to his March 14, 2023 correspondence.

In response to Umeh's March 14, 2023 letter to this Court, the law clerk for this Court (Judge Jed S. Rakoff) responded that Umeh may proceed with a motion for compassionate release pursuant to 18 U.S.C. Section 3582(c)(1)(A). In light of this response and to avoid presentation of unwarranted arguments such as jurisdictional issues, Umeh respectfully requests that this Court appoint Attorney Alexey TARASOV pursuant to the Criminal Justice Act, 18 U.S.C. Section 3006A to represent him in presenting an appropriate motion before this Court.

Attorney Alexey TARASOV previously represented Umeh's co-defendant, Mr. Constantin Yaroshenko ("Yaroshenko") hence he is familiar with the background and circumstances of this case and he was fully involved with arrangement (prisoner exchange) which led to Yaroshenko's release from imprisonment.

However, in the event that this Court deems Attorney Alexey Tarasov unacceptable, then this Court should appoint any other suitable attorney to represent him in presenting an appropriate motion before the Court.

In light of the above, Umeh respectfully requests that this Court grant his request to appoint attorney Alexey TARASOV or any other suitable attorney to represent him in presenting an appropriate motion as directed by this Court through its law clerk.

Dated: June 26, 2023
White Deer, Pa. 17887-1000

Respectfully submitted


/s/ Chigbo P. Umeh
CHIGBO P. UMEH
FCI Allenwood Low
Federal Correctional Institution
P. O. Box 1000
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Defendant Pro Se

